

August 6, 2004

Ms. Jennifer J. Johnson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.,
Washington, D.C. 20551

Via e-mail: regs.comments@federalreserve.gov

Subject: [Regulation DD; Docket No. R-1197] Truth in Savings

We are pleased to respond to the Board of Governors' of the Federal Reserve System request for comment concerning the proposed changes to Federal Reserve Regulation DD.

High Point Bank and Trust recently implemented an overdraft protection service for our retail customers. This service provides our customers with an alternative to third party return item fees and helps protect them as a result of an error or an emergency. After a thorough review process the Bank selected Pinnacle Financial Services and Jack Henry & Associates to provide this service for our customers. We implemented the program adhering to Pinnacle's Best Practices and we are pleased to find that they are significantly inline with the proposed changes to Federal Reserve Regulation DD. The Bank agrees with the Board of Governors' statement that additional information about the costs of overdraft services may be provided to the consumer under TISA and Reg DD as opposed to TILA and Reg Z which would be extremely burdensome to institutions and would serve no additional consumer need.

The Bank respectfully offers comments on:

Section 230.6 Periodic Statement Disclosures

Comment: *Under proposed § 230.6(a)(3)(ii), institutions would be required to disclose overdraft fees or returned-item fees on periodic statements on an aggregate basis for the statement period. These disclosures should be required of ALL institutions and not discriminate against those that disclose limits in advance. All consumers should receive the benefit from this disclosure if it is to be required at all.*

If you should have any questions, please let me know.

Sincerely,

Steven V. Hall
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High Point Bank and Trust

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